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6 Attorneys for Jeremy W. Faith, Chapter 11 Plan Fiduciary  
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8 **UNITED STATES BANKRUPTCY COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **SAN FERNANDO VALLEY DIVISION**

11 In re: Case No.: 1:22-bk-11181-MB  
12 NATIONAL ASSOCIATION OF Chapter 7  
TELEVISION PROGRAM EXECUTIVES,  
13 INC., Adv. No.: 1:24-ap-01052-MB

14 Debtor.

15 JEREMY W. FAITH, Chapter 11 Plan Plaintiff,  
Fiduciary, v. **PLAINTIFF'S UNILATERAL STATUS**  
16 **REPORT**

17 PERY CONSULTING GROUP, LLC, a Plaintiff,  
California Limited Liability Company v.  
18 Defendant. Place: U.S. Bankruptcy Court  
19 Courtroom 303  
21041 Burbank Boulevard  
Woodland Hills, CA 91367

20 **Status Conference:**

Date: October 23, 2025  
Time: 1:30 p.m.  
Place: U.S. Bankruptcy Court  
Courtroom 303  
21041 Burbank Boulevard  
Woodland Hills, CA 91367

21 **A. PLEADINGS/SERVICE**

- 22 1. Have all parties been served with the complaint/counterclaim/cross-claim,  
etc. (Claims documents)? **No**.
- 23 2. Have all parties filed and served answers to the Claims Documents? **No**
- 24 3. Have all motions addressed to the Claims Documents been resolved? **No**
- 25 4. Have counsel met and conferred in compliance with LBR 7026-1? **No**.
- 26 5. If your answer to any of the four preceding questions is anything other than  
27 an unqualified "YES", please explain: **See Section G Below.**

1           **B. READINESS FOR TRIAL**

- 2       1. When will you be ready for trial in this case? **N/A**  
3       2. If your answer to the above is more than 4 months after the summons  
4 issued in this case, give reasons for further delay. **N/A**  
5       3. When do you expect to complete your discovery efforts? **N/A**  
6       4. What additional discovery do you require to prepare for trial? **N/A**

7           **C. TRIAL TIME**

- 8       1. What is your estimate of the time required to present your side of the case at  
9 trial (including rebuttal stage of applicable)? **N/A**  
10      2. How many witnesses do you intend to call at trial (including opposing  
11 parties)? **N/A**  
12      3. How many exhibits do you anticipate using at trial? **N/A**

13           **D. PRETRIAL CONFERENCE**

- 14      1. A pretrial conference is not requested for the following reason: **Plaintiff**  
15 **intends to add defendants and additional allegations to the complaint.**

16           **E. SETTLEMENT**

- 17      1. What is the status of settlement efforts? **N/A**  
18      2. Has this dispute been formally mediated? **No**  
19      3. Do you want this matter sent to mediation at this time? **No**

20           **F. FINAL JUDGMENT/ORDER:**

21      Any party who contests the bankruptcy court's authority to enter a final judgment  
22 and/or order in this adversary proceeding must raise its objection below. Failure to select  
23 either box below may be deemed consent. **Plaintiff consents. Defendant has not**  
24 **responded. See Section G below.**

25           **G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL:**

26      Following the Default, on January 13, 2025, Plaintiff received a letter from Rafe  
27 Pery, the C.E.O. of Pery Consulting Group LLC ("Pery Consulting"), regarding the  
28 complaint. In the letter, Mr. Pery notified the Plaintiff, that Pery Consulting "completed a

1 sale if its assets through an Article 9 transaction and is in liquidation." Mr. Pery concluded  
2 his letter by stating that "any attempt to collect on prior payments made or collect on a  
3 judgement will be fruitless as Pery Consulting does not have any assets." Thereafter,  
4 Plaintiff learned of facts demonstrating that Pery Consulting fraudulently transferred its  
5 assets to its alter ego Accounting 501.

6 Plaintiff intends to seek leave to amend the complaint to add defendant, Accounting  
7 501, LLC a Wyoming Limited Liability Company, registered in California as a foreign entity  
8 under the California Alternative Name A501, LLC (referred to herein as "Accounting 501"),  
9 and that is the immediate or mediate transferee of property transferred by the debtor that  
10 is the subject of the complaint and recoverable under section 550 of the Bankruptcy Code.  
11 Moreover, Plaintiff intends to allege the factual predicates establishing that Accounting  
12 501 is an alter ego of defendant Pery Consulting Group, LLC ("Pery Consulting").

13 Plaintiff has also been working to obtain additional data and documents from  
14 NATPE's directors and officers and former counsel relevant to the Estate's claims to  
15 properly prepare the amended complaint. However, these efforts have been delayed due  
16 to various disputed turnover issues related to the recovery of NATPE's books and records.

17 Plaintiff will also seek to consolidate this action with the related pending adversary  
18 proceeding *Faith v. JP Bommel, et al.*, Case No. 1:24-ap-01055-MB (the "Bommel  
19 Adversary") as certain of the new allegations involve common questions of law or fact,  
20 and Plaintiff believes that consolidation of the two actions will streamline proceedings and  
21 avoid duplication of effort and inconsistent rulings.

22 Plaintiff anticipates having a draft of the amended completed within the next ten  
23 days and will file a motion for leave to amend as well as a motion to consolidate the  
24 instant action with the Bommel Adversary within the next 30 days.

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1       Based on the foregoing, Plaintiff respectfully requests that the status conference  
2 hearing in this matter be continued for approximately 90 days to allow Plaintiff to seek  
3 leave to amend and to consolidate this action with the Bommel Adversary.

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DATED: October 17, 2025

**MARGULIES FAITH, LLP**

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By: /s/ Meghann A. Triplett

Meghann A. Triplett

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Attorneys for Plaintiff, Jeremy W. Faith,  
Chapter 11 Plan Fiduciary

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**DECLARATION OF MEGHANN A. TRIPPLETT**

I, Meghann A. Triplett, declare as follows:

3       1. I am an attorney licensed to practice before all courts of the State of  
4 California and before the United States District Court for the Central District of California.  
5 I am an attorney at the law firm of Margulies Faith, LLP, and am one of the attorneys  
6 responsible for the representation of Jeremy W. Faith, Chapter 11 Plan Fiduciary and  
7 Plaintiff herein (“Plaintiff”).

8       2. I make this Declaration in support of the Plaintiff's unilateral status report, to  
9 which this declaration is attached.

10       3. The Defendant failed to file a response to the Complaint and on December  
11 31, 2024, the Clerk entered default against the Defendant (Adv. Dkt. No. 10).

12       4. On or about January 13, 2025, I received a letter via email from Pery  
13 Consulting Group LLC (“Pery Consulting”) signed by Rafe Pery, the C.E.O. of Pery  
14 Consulting, responding to the complaint. In the letter, Pery notified the Plaintiff that Pery  
15 Consulting “completed a sale if its assets through an Article 9 transaction and is in  
16 liquidation.” Mr. Pery concluded his letter by stating that “any attempt to collect on prior  
17 payments made or collect on a judgement will be fruitless as Pery Consulting does not  
18 have any assets.”

19       5. Plaintiff conducted further investigation and has learned facts demonstrating  
20 that Pery Consulting fraudulently transferred all or substantially all of its assets to its alter  
21 ego, Accounting 501.

22       6. Plaintiff intends to seek leave to amend the complaint to add defendant,  
23 Accounting 501, LLC a Wyoming Limited Liability Company, registered in California as a  
24 foreign entity under the California Alternative Name A501, LLC (referred to herein as  
25 "Accounting 501"), and that is the immediate or mediate transferee of property transferred  
26 by the debtor that is the subject of the complaint and recoverable under section 550 of the  
27 Bankruptcy Code. Moreover, Plaintiff intends to allege the factual predicates establishing  
28 that Accounting 501 is an alter ego of defendant Pery Consulting.

1       7. Plaintiff has also been working to obtain additional data and documents from  
2 NATPE's directors and officers and former counsel relevant to the Estate's claims to  
3 properly prepare the amended complaint. However, these efforts have been delayed due  
4 to various disputed turnover issues related to the recovery of NATPE's books and records.

5       8. Plaintiff will also seek to consolidate this action with the related pending  
6 adversary proceeding *Faith v. JP Bommel, et al.*, Case No. 1:24-ap-01055-MB (the  
7 “Bommel Adversary”) as certain of the new allegations involve common questions of law  
8 or fact, and Plaintiff believes that consolidation of the two actions will streamline  
9 proceedings and avoid duplication of effort and inconsistent rulings.

10       9. Plaintiff anticipates having a draft of the amended completed within the next  
11 ten days and will file a motion for leave to amend as well as a motion to consolidate the  
12 instant action with the Bommel Adversary within the next 30 days.

13       10. Based on the foregoing, Plaintiff respectfully requests that the status  
14 conference hearing in this matter be continued for approximately 90 days to allow Plaintiff  
15 to seek leave to amend and to consolidate this action with the Bommel Adversary.

16 I declare under penalty of perjury under the laws of the United States of America  
17 that the foregoing facts are true and correct, and that this Declaration was executed on  
18 October 17, 2025, at San Luis Obispo, California.

/s/ Meghann A. Triplett  
Meghann A. Triplett

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
16030 Ventura Blvd., Suite 470, Encino, CA 91436

A true and correct copy of the documents entitled **PLAINTIFF'S UNILATERAL STATUS REPORT; DECLARATION OF MEGHANN A. TRIPPLETT IN SUPPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On October 17, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On October 17, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**JUDGE'S COPY:** Service on Judge not required per Judge Barash's Procedures re: Serving Judge's Copy of Documents (Rev. 1/8/24)

**DEFENDANT:** Pery Consulting Group, LLC, Agent: Rafe Pery, 7607 Wiscasset Drive, West Hills, CA 91304

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

NONE.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 17, 2025  
Date

Vicky Castrellon  
Printed Name

/s/ Vicky Castrellon  
Signature

## ADDITIONAL SERVICE INFORMATION

### 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

#### **Samuel Mushegh Boyamian on behalf of Plaintiff Jeremy W. Faith, Chapter 11 Plan Fiduciary**

samuel@marguliesfaithlaw.com,  
Angela@MarguliesFaithLaw.com;Vicky@MarguliesFaithLaw.com;Amber@MarguliesFaithLaw.com

#### **John-Patrick McGinnis Fritz (TR)**

jpftrustee@lnbyg.com, jpf@trustesolutions.net

#### **Jonathan Serrano on behalf of Interested Party Courtesy NEF**

Jonathan@MarguliesFaithLaw.com,  
vicky@marguliesfaithlaw.com;angela@marguliesfaithlaw.com;amber@marguliesfaithlaw.com

#### **Meghann A Triplett on behalf of Plaintiff Jeremy W. Faith, Chapter 11 Plan Fiduciary**

Meghann@marguliesfaithlaw.com,  
Angela@MarguliesFaithLaw.com;Vicky@MarguliesFaithLaw.com;Amber@MarguliesFaithLaw.com;Drew@marguliesFaith  
Law.com

#### **United States Trustee (SV)**

ustpregion16.wh.ecf@usdoj.gov